



COLORADO
**Division of Reclamation,
Mining and Safety**
Department of Natural Resources

1313 Sherman St. Room 215
Denver, CO 80203

December 2, 2020

Joe Lammana
Ready Mixed Concrete Company
11778 Hwy 52
Ft Lupton CO 80621

RE: File M2008-082; Morton Lakes; Technical Revision 07 (TR07) – Adequacy Review

Mr. Lammana:

The Division of Reclamation, Mining and Safety received Technical Revision 07 (TR07) for the above listed permit on November 25, 2020. The decision date for this revision has been set for December 28, 2020. DRMS has completed the initial adequacy review of TR07, and as with most revisions, there are several items that will require clarification of the existing information or submittal of additional information.

Please be advised that if you are unable to satisfactorily address any concerns identified in this review before the decision date, it will be your responsibility to request an extension of the review period. If there are outstanding issues that have not been adequately addressed prior to the end of the review period, and no extension has been requested, the Division must deny this revision.

The TR as submitted proposes modifications to the existing approved spillway configurations and final reclamation configuration of the lined reservoirs identified in TR07 as Ponds 1, 2 and 3. Spillway configurations have been modified (widened), and additional interior bank stabilization and reinforcement in the form of compacted clay liner(s) and reduced interior sloping from 3:1 to 4:1 has also been proposed for some areas. Based on the information provided in the revision, DRMS will also require additional information for the slurry walls currently installed for Ponds 1, 2, and 3, and backfill of a portion of Pond 3 to original grade. This additional information will allow DRMS to adjust the bond for the site as appropriate.

Please provide the requested information for the following items:

- 1) Please submit as-built specifications and total installation costs for the slurry walls installed for lined reservoirs identified in the revision as Ponds 1, 2 and 3. Please also provide any documentation provided to the operator by State Engineer's Office



(SEO) to verify if any of the installed slurry walls have been provisionally approved by the SEO. DRMS will adjust the bond for the site to include 20% of the total installation cost for slurry walls that have been provisionally approved by SEO, and 100% of the installation cost for any slurry walls that have not been provisionally approved by SEO, around areas where groundwater has been exposed.

- 2) Please provide costs and backup documentation to modify or install spillway structures as identified and specified in TR07 for Ponds 1, 2, and 3.
- 3) Please provide costs and backup documentation to install the compacted clay slope reinforcement in Pond 1 and reduce the interior slope from 3:1 to 4:1. This cost should include the cost per cubic yard for installation of compacted clay material and required QA/QC testing to make sure it meets the specifications designated in the TR.
- 4) Please provide costs and backup documentation to install compacted clay liner and/or reduce interior sloping as needed in Ponds 2, and 3 as previously stated.
- 5) Please modify the provided maps to make sure that all areas to be reinforced with compacted clay and/or modified from 3:1 interior slopes to 4:1 interior slopes for Ponds 1-3 are clearly and accurately depicted.
- 6) Please provide the amount of material (in CY) needed to backfill the north portion of Pond 3 as shown in TR07 to the new configuration. Additional information such as push distance will also be useful in DRMS calculation of the bond needed to place this material.
- 7) Please correct the permit boundary in the NW corner of the permit on the maps provided to match the approved permit boundary as approved in AM01.
- 8) Based on a phone conversation with Mr. Lammana on December 1, 2020, the spillway structures and slurry walls for Ponds 4A and 4B, as well as the additional slurry wall and subsequent final mining of the west side of Pond 2 will be addressed in a subsequent technical revision. Therefore, please remove these items as appropriate from the provided text and figures for this revision.

Providing all costs using a per-feature, or per-pond breakout will greatly streamline bond reduction requests by the operator when these features are completed.

This letter shall not be construed to mean that there are no other technical issues in the submittal. Other issues may arise during the review process, or as additional information is supplied.

If you have any questions, please contact me at (303) 229-9414.

Sincerely,



Eric Scott
Environmental Protection Specialist